

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

This document applies to:

ETHICON WAVE 9 CASES LISTED IN
PLAINTIFFS' NOTICE OF ADOPTION AT
EXHIBIT A (Doc. 8274)¹

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF WAVE 3 *DAUBERT*
RESPONSE REGARDING SALIL KHANDWALA, M.D.,
FOR WAVE 9**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Salil Khandwala, M.D., in the Wave 9 cases identified in Exhibit A to their Notice. *See* Doc. 8274. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Salil Khandwala, M.D. for Ethicon Wave 3 (Doc. 2925) as their response for Wave 9. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

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¹ Plaintiffs' Exhibit A listed *Elaine Lawson* (2:13-cv-23274), *Lori Ransom* (2:13-cv-18285), and *Kay and Robert Zariski* (2:14-cv-26753). The *Lawson* case is closed and was terminated by the Court on May 9, 2019. The *Zariski* case is also closed and was terminated by the Court on May 9, 2019.

/s/ Susan M. Robinson

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CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage